

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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YOSSEF KAHLON

Plaintiff,

24-CV-02439 (BMC)

-against-

COUNTY OF NASSAU, JOHN/JANE DOE
MEMBERS OF THE NASSAU COUNTY
DISTRICT ATTORNEY'S OFFICE, CELINE
BOULBEN and JOHN /JANE DOE
"METOO" ORGANIZATION(S),

NOTICE OF MOTION

Defendants.

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CELINE BOULBEN,

Counterclaim-Plaintiff,

-against0

YOSSEF KAHLON,

Counterclaim-Defendant.

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PLEASE TAKE NOTICE that upon the Declaration of Ralph J. Reissman dated February 7, 2025 and the exhibits annexed thereto, defendant County of Nassau's Local Rule 56.1 Statement dated February 7, 2025, the Affidavit of Matthew Perry sworn to on February 5, 2025 with attached exhibit, defendant County of Nassau's Memorandum of Law in support of motion for summary judgment dated February 7, 2025 and upon all prior pleadings and proceedings heretofore had herein, defendant County of Nassau will move this Court, before the Hon. Brain M. Cogan, United States District Judge, located at the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York for an Order of Summary Judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure, dismissing with prejudice the Complaint of plaintiff Yoseff Kahlon in its entirety against the County of Nassau, on the ground that there are

no genuine material issues of fact to be tried, and that defendant County of Nassau is entitled to judgment as a matter of law, together with all such other and further relief as the Court deems just and proper.

Dated: Mineola, New York
February 7, 2025

THOMAS A. ADAMS
Nassau County Attorney
Attorney for Defendant
County of Nassau

By: /s/ Ralph J. Reissman
RALPH J. REISSMAN
Deputy County Attorney
1 West Street
Mineola, New York 11501
(516) 571-3046

TO: All Counsel of Record (via ECF)